



March 7, 2014

Baca Valley Telephone Company, Inc.
Sierra Communications, Inc.



532 Broadway Avenue
P.O. Box 67
Des Moines, NM 88418

Marlene H. Dortch
Secretary
Federal Communication Commission
Washington, DC 20554

Re: WC Docket 10-90
Sierra Communications, Inc's Letter Expressing Interest In Rural Broadband
Experiments in Price-Cap Carrier Service Areas

Sierra Communication, Inc. ("Sierra") is a competitive local exchange carrier ("CLEC") and a broadband internet service provider ("ISP") in New Mexico. Sierra is filing this letter expressing its interest in participating in the Rural Broadband Experiments in price-cap carrier service areas to provide robust, scalable high-speed broadband in unserved high-cost areas with additional Connect America Funding.¹ Sierra is not currently an Eligible Telecommunications Carriers ("ETC") but will obtain an ETC designation in New Mexico from the New Mexico Public Regulation Commission within ninety days of being awarded funding for its Broadband Experiment proposal.²

1. Background

Sierra is a competitive telecommunications and broadband service provider in northeastern New Mexico. Sierra provides voice and broadband service in rural Colfax County which encompass an area of 3,768 square miles. The population of Colfax County is relatively small with less than 14,000 residents according to the Census of 2010. Sierra's offerings for these areas include but are not limited to residential and business voice and broadband services.

2. The Proposed Geographic Territory

Sierra proposes to provide broadband to three eligible price-cap census tracts in rural Colfax County. A large portion of the county lies in the Sangre de Cristo Mountains and the geography of the area ranges from being mountainous to forests, plains, and alpine meadows. The county contains numerous state parks, ski resorts, scenic vistas, and national forests. The population density is 4 people per square mile with an average housing density of 2 per square mile. Due to the terrain of the county and potentially large areas of the eligible census tracts, Sierra proposes to utilize both fiber optics technology and wireless technology to provide voice and broadband services to the three eligible price-cap area census tracts (35007950600, 35007950600, and 35007950700). These three eligible census tracts consist of a combined 2214 eligible high cost locations and 439 extremely high cost locations. The chart below provides other pertinent information regarding the eligible Broadband Experiment census tract areas.

¹ See *Technology Transitions et al.*, GN Docket No. 13-5 et al., Order, Report and Order and Further Notice of Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5 (rel. January 31, 2014).

² *Id.*, Para. 18, pp. 42-43 (Requiring ETC designation to be confirmed within ninety days after receiving a funding award for a Broadband Experiment).

State	County	County Name	Tract ID	Eligible High Cost Locations	Extremely High Cost Locations	Annual Support
NM	35007	Colfax	35007950500	204	86	\$ 65,818.13
NM	35007	Colfax	35007950600	1958	331	\$734,789.70
NM	35007	Colfax	35007950700	52	22	\$ 22,901.86

Sierra is unable at this time to provide specific information regarding the particular population base, the number of anchor institutions, or other information since the census blocks within these eligible census tracts have not yet been identified. Once the census blocks are identified, Sierra will be in a better position to provide more specific details relating to the population base, number of anchor institutions, and other details from these areas.

3. Proposed Technology

Sierra intends to utilize both fiber optic technology and wireless technology to provide voice and broadband service to these areas. However, once the particular census blocks within these census tracts are identified, Sierra will be in a better position to provide more specific details regarding the technology to be used in the Broadband Experiment.

4. Type of Services

Sierra will provide services to customers in the Broadband Experiment area that will include, but will not be limited to, Voice, 911 Emergency Calling, Long Distance Calling, Operator Services, Information Services, Voice Mail Services, Other Calling Features, Security Services, Broadband Services with speed from 4 Mbps downstream and 1 Mbps upstream to 100 Mbps downstream and 25 Mbps upstream.

5. Price of Services

Sierra proposes to offer its customers several voice and broadband bundled services that will range from \$59.95 to \$149.95.

6. Projected Funding Needs and Length of Funding.

Sierra estimates that a Broadband Experiment of this nature would cost an estimated one time amount of \$6,500,000.00 to complete construction and that it would likely take a minimum of one year to complete the project. However, Sierra believes that due to the nature of the eligible census tracts and that the particular eligible high-cost census blocks for this experiment have yet to be identified, Sierra will need to perform a more in-depth analysis of the construction and costs once the actual eligible census block are identified. Thus, Sierra may submit updated details of the construction and estimates of the costs with a formal proposal.

7. Summary

Sierra has recognized for some time that there is a great need for voice and high speed broadband service in the rural areas of Colfax County, New Mexico. However, due to the remoteness and the terrain of the area, the cost of construction to provide high speed broadband has hindered the availability of the service in these areas. It is through potential projects like the Broadband Experiments that these remote areas can be offered the same voice and broadband services at affordable prices that individuals residing in more urbanized areas already enjoy.

Sierra appreciates the opportunity to submit this non-binding Expression of Interest. Please contact the undersigned with any questions.

Sincerely

A handwritten signature in blue ink, appearing to read "Paul Briesch", with a stylized flourish extending to the right.

Paul Briesch
General Manager
Sierra Communications, Inc.